

EXHIBIT B

BRAUNHAGEY & BORDEN LLP

San Francisco & New York

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June 2, 2022

VIA EMAIL

Dwain K. Rogers, Llano County Attorney
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Re: Motion for Expedited Discovery

Dear Counsel:

To the extent that you object to Plaintiffs' discovery requests on the grounds that they "seek information Plaintiffs already have" we are happy to enter into stipulations concerning undisputed facts. This would obviate the need for discovery on those topics, substantially limiting the scope of discovery necessary to litigate the motion for preliminary injunction. Please advise whether the below stipulations are acceptable to you.

- All books removed from the Llano County Library System by Defendants between June 2021 and the present were removed solely because Defendants thought the content of those books was inappropriate.
- None of the books removed from the Llano County Library System between June 2021 and the present were removed in accordance with the Library System's Materials Policy.
- Defendants discontinued Overdrive solely because they were unable to ban books with which they disagreed on that platform.
- Defendants removed books from the Llano County Library System between June 2021 and the present based solely on the fact that those titles were included in the Krause list.
- The Library System's 2006 Materials Policy, attached to Plaintiffs' RFAs as Exhibit A, applied to the selection of materials for, and the removal of materials from, the Library System between June 2021 and the present.

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- *They Called Themselves the K.K.K.: The Birth of an American Terrorist Group* by Susan Campbell Bartoletti is not pornographic or obscene and Defendants removed that book from the Library System because they disagree with its content.
- Books with inappropriate content and sexual content can have serious literary, artistic, political, and scientific value.
- There are still materials with sexual content available in the library system.

Finally, your assertion that gathering the limited discovery we request is overly burdensome is at odds with your statement, on May 18, 2022, that you would be able to gather responsive information and documents by June 1, 2022 *because* of the limited scope of our requests and the fact that you had already gathered most of the applicable documents in response to prior records requests. If you can provide more detail regarding the burden you face, we would be happy to work with you to alleviate as much of that burden as possible.

Very truly yours,



Ellen V. Leonida